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## *Attorneys for Standard Fir*

*Company, erroneously named as The Travelers Indemnity Company dba The Travelers Home and Marine Insurance Company*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

TAEKKEUN YOON, an individual; SU JUNG KIM, an individual,

Plaintiffs,

V.

THE TRAVELERS INDEMNITY COMPANY,  
dba TRAVELERS HOME AND MARINE  
INSURANCE COMPANY, a Connecticut  
Corporation; DOES I through XV, and ROE  
Corporations I through X, inclusive,

## Defendants.

CASE NO. 2:20-cv-01507-JCM-EJY

**STIPULATION AND ORDER  
EXTENDING THE TIME FOR  
PLAINTIFFS TO RESPOND TO  
DEFENDANT THE STANDARD FIRE  
INSURANCE COMPANY'S MOTION  
TO DISMISS [ECF NO. 6] (SECOND  
REQUEST)**

IT IS HEREBY STIPULATED AND AGREED by Plaintiffs Taekkeun Yoon and Su Jung

1 Kim (“Plaintiffs”) and Defendant The Standard Fire Insurance Company (“Standard Fire”), by and  
2 through their respective counsel, that the time for Plaintiffs to file and serve their Response to  
3 Standard Fire’s Motion to Dismiss Plaintiffs’ Complaint (ECF No. 6) be extended 7 days through  
4 and including Monday, October 12th, 2020.

5 Pursuant to Fed. R. Civ. P. 6(b)(1)(A) and Local Rule IA 6-1(a), Plaintiffs represent that  
6 points and authorities presented in Standard Fire's Motion require additional time to review and to  
7 present an adequate and thorough counter-argument and supporting authorities. Further, with the  
8 necessities of working remotely due the ongoing COVID-19 pandemic additional time is required  
9 for counsel to prepare its Response and to obtain client review and approval of the Response.

10 Accordingly, the Plaintiffs and Standard Fire hereby agree and stipulate to allow Plaintiffs  
11 until October 12, 2020 to file its Response to Standard Fire's Motion to Dismiss. Further, the  
12 parties respectfully request this honorable Court enter an Order providing the same.

13 DATED: October 6, 2020

DATED: October 6, 2020

14 || THE LAW FIRM OF PARKE ESQUIRE

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16 By: /s/ Jose E. Valenzuela  
17 Jose E. Valenzuela III, Esq. (NV Bar No. 12510)  
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HENDERSON, P.C. 39352

24 IT IS SO ORDERED:

Xenia C. Mahan  
UNITED STATES DISTRICT JUDGE

DATED: October 7, 2020.

**CERTIFICATE OF SERVICE**

I certify that a copy of the foregoing **STIPULATION AND ORDER EXTENDING THE TIME FOR PLAINTIFFS TO RESPOND TO DEFENDANT THE STANDARD FIRE INSURANCE COMPANY'S MOTION TO DISMISS [ECF NO. 6] (SECOND REQUEST)** was served by the method indicated:

- BY FAX:** by transmitting via facsimile the document(s) listed above to the fax number(s) set forth below on this date before 5:00 p.m. pursuant to EDCR Rule 7.26(a). A printed transmission record is attached to the file copy of this document(s).
- BY U.S. MAIL:** by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Las Vegas, Nevada addressed as set forth below.
- BY ELECTRONIC SERVICE:** submitted to the above-entitled Court for electronic service upon the Court's Registered Service List for the above-referenced case.
- BY EMAIL:** by emailing a PDF of the document listed above to the email addresses of the individual(s) listed below.

Dated: October 6, 2020

/s/ Jennifer Parsons  
An Employee of Foran Glennon